



## BioSYSTEMS, LLC

August 10, 2005

Ms. Katherine Benham  
USDA-AMS-TMD-NOP  
1400 Independence Avenue, SW  
Room 4008-So., Ag Stop 0268  
Washington, DC 20250-0200

RAYMOND E. GROVER  
1809 GREEN HILL RD  
VIRGINIA BEACH, VA 23454  
PHONE (757) 481-2487  
FAX (757) 496-3243  
RGROVER@BIOSYSTEMSLLC.COM

Dear Ms. Benham:

I represent Nutrients Plus LLC, a marketing company that has the exclusive marketing rights for a processed manure. The processed manure produced by Daylay Egg Farm, Inc in West Manchester, Ohio will meet the definition of compost if the following changes are made.

1. Include the 'Draft 3- Rose Modifications example 3:'

"Processed manure materials must be made from manure that has been heated to a temperature in excess of 150<sup>o</sup> F (65<sup>o</sup> C) for one hour or more and dried to a moisture level of 12% or less, or an equivalent heating and drying process that produces a product that is negative for pathogenic contamination by Salmonella and fecal coliform material."

2. Expand the carbon to nitrogen ratio:

Change the range from the 25:1 - 40:1 to the range 5:1 - 60:1 which will more accurately reflect the inclusion of processed manure.

We feel that these changes to the compost definition will benefit both the producer and the grower, and will serve the objective of.....

"manage plant and animal materials to maintain or improve soils organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances"

The Daylay composting process was developed in conjunction with The Ohio State University. (1) (2)  
Copies of these papers will be sent to your attention under separate cover.

Thank you for the opportunity to comment on this issue.

Sincerely,

Ray Grover  
BioSystemsLLC

CC: Dr. Harold Keener, The Ohio State University/OARDC, Wooster, Ohio  
Mr. Mark Meyer, Daylay Egg Farm, Inc  
Mr. John Moriarty, Nutrients Plus LLC

- (1) Atmospheric NH<sub>3</sub> Emissions and N-Balances for a 1.6 million Caged Layer Facility-Manure Belt/Composting System vs. Deep Pit Operation , H. M. Keener, D. L. Elwell, D Grande
- (2) Composting Unamended Chicken Manure, D.L. Elwell, H. M. Keener, D. S. Carey, and P. P. Schlak